

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ULTRAVISION TECHNOLOGIES, LLC,)	
)	
Plaintiff,)	Case No. 2:18-cv-00100-JRG-RSP
)	(LEAD CASE)
v.)	
)	JURY TRIAL DEMANDED
GOVISION, LLC,)	
)	
Defendant.)	
)	
)	
ULTRAVISION TECHNOLOGIES, LLC,)	
)	
Plaintiff,)	Case No. 2:18-cv-00108-JRG-RSP
)	(CONSOLIDATED CASE)
v.)	
)	JURY TRIAL DEMANDED
PRISMAFLEX INTERNATIONAL)	
FRANCE, S.A. AND SHENZHEN)	
PRISMATRONIC CHINA ELECTRONIC)	
TECHNOLOGY LTD. CO.,)	
)	
Defendants.)	

**DECLARATION OF DANIEL J. SHEA, JR. IN SUPPORT OF
ULTRAVISION TECHNOLOGIES, LLC'S SUR-REPLY IN FURTHER
OPPOSITION TO PRISMAFLEX INTERNATIONAL FRANCE S.A.'S
SECOND RENEWED MOTION TO TRANSFER VENUE AND DISMISS (DKT. 93)**

I, DANIEL J. SHEA, JR., an attorney duly admitted to practice in the Eastern District of Texas, hereby declare under penalty of perjury as follows:

1. I have personal knowledge of the facts set forth in this Declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I am an associate at the law firm of Brown Rudnick LLP, counsel of record for Plaintiff Ultravision Technologies, LLC ("Ultravision" or "Plaintiff") in the above-referenced

action. I submit this declaration in support of Ultravision's Sur-Reply in Further Opposition to Prismaflex International France S.A.'s ("PI") Second Renewed Motion to Transfer and Dismiss (Dkt. 93).

3. Attached hereto as Exhibit 7 is a true and correct copy of a Prismaflex International May, 2018 catalog. Relevant information has been highlighted with a yellow box for the Court.

4. Attached hereto as Exhibit 8 is a true and correct copy of Appendix 2 of Ultravision's disclosure of asserted claims and infringement contentions. Relevant information has been highlighted with yellow boxes for the Court.

5. Attached hereto as Exhibit 9 is a true and correct copy of the Anthem Displays homepage found at <http://www.anthemdisplays.com/>, and last accessed August 13, 2019.

6. Attached hereto as Exhibit 10 is a true and correct copy of the LinkedIn page for Group Sales Director of Prismaflex International and Anthem Displays Partner, Nico Marais. The profile can be found at <https://www.linkedin.com/in/nico-marais-42016212/>, and was last accessed August 13, 2019. Relevant information has been highlighted for the Court.

7. Attached hereto as Exhibit 11 is a true and correct copy of the Anthem Displays webpage for "Our Work" found at <http://www.anthemdisplays.com/our-work.html>, and last accessed August 13, 2019. Relevant information has been highlighted for the Court.

8. Attached hereto as Exhibit 12 is a true and correct copy of the Lamar Advertising Company website showing Lamar's digital billboard inventory found at <http://www.lamar.com/InventoryBrowser>, and last accessed August 16, 2019.

I declare under penalty of perjury that the foregoing is true and correct. Executed on
August 16, 2019 in New York, New York.

/s/ *Daniel J. Shea, Jr.*
Daniel J. Shea, Jr.